

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF TENNESSEE**

BRIAN CUMMINGS,)	
)	
Plaintiff,)	
)	NO.: 3:22-cv-00301
v.)	
)	CHIEF JUDGE CRENSHAW
BRETTON KEEFER, on behalf of the deceased,)	MAGISTRATE JUDGE NEWBERN
CHESTA SHOEMAKER,)	
AFSOON HAGH, and)	
JEANNE BURTON, Trustee on behalf of)	
CUMMINGS MANOOKIAN, PLC,)	
)	
Defendants.)	

**MOTION FOR SERVICE OF PROCESS ON DEFENDANT BY U.S. MARSHAL AND
FOR AN ADDITIONAL 90 DAYS FOR SERVICE**

Plaintiff moves this Court for an Order pursuant to FRCP 4(c)(3) directing the U.S. Marshal or his deputy to serve the Defendant Afsoon Hagh with process in this case.

The Defendant, Afsoon Hagh, an attorney, licensed in the State of Tennessee, is aware of this lawsuit but is attempting to avoid service of process and all conventional methods have been unsuccessful as described in the declaration of counsel filed contemporaneously herewith.

Accordingly, it is necessary that an Order issue for the U.S. Marshal to serve the Defendant.

On the 28th day of June 2022 this Court granted the Plaintiff an additional 90 days within which to serve the Defendant Hagh, however, Plaintiff acting with due diligence has been unable to serve the Defendant and needs an additional 90 days for service.

Respectfully submitted,

/s/ James W. Price, Jr.

James W. Price, Jr., #3538

Attorney for Plaintiff

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CERTIFICATE OF SERVICE

I certify that a true and exact copy of the foregoing document was delivered by electronic court filing or first class mail on this the 13th day of September, 2022, to:

Bretton Keefer
5960 Pumpkintown Lane
Lafayette, TN 37083

Afsoon Hagh
Hagh Law PLC
226 Pelham Dr.
Brentwood, TN 37027

Afsoon Hagh
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Nashville, TN 37215

Phillip G. Young, Jr.
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6100 Tower Circle, Ste. 200
Franklin, TN 37067

/s/ James W. Price, Jr.

James W. Price, Jr.